

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.
Philadelphia, Pa. 19106

SUBJECT: RCRA Inspection
Amoco Oil
MDD003093598

DATE: APR 07 1981

FROM: Robert Greaves, Environmental Engineer *RG*
RCRA Compliance and Hazardous Waste Section 3EN25

TO: File

Thru: Robert Collings, Chief *RHC*
Water & RCRA Enforcement 3EN32

Based upon a review of the RCRA inspection report for the facility referenced above, I have determined that no further action is required at this time.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.

Philadelphia, Pa. 19106

SUBJECT: Amoco Oil RCRA Inspection

DATE: APR 7 1981

FROM: Robert Greaves, Environmental Engineer *RG*
RCRA Compliance & Hazardous Waste Section 3EN25

TO: File

On February 13, 1981, I spoke to Mike Chuck (301-355-5325) of Amoco Oil regarding the EPA inspection of 11/26/80. As a result of this RCRA inspection EPA inspectors indicated non-compliance with several regulations pertaining to treatment, storage and disposal at the facility. The following steps have been taken by the company to remedy these deficiencies as of the date of our telephone conversation.

- 1) Signs were not posted at the active portion of the facility as of 11/26/80.

Company has signs and posted them.

- 2) Arrangements with local authorities to provide assistance during emergencies were not made as of 11/26/80. Company has contacted local fire department and will contact local police by April when plant becomes operational. Plant is an asphalt facility and is shut down in winter.
- 3) An evacuation plan for facility personnel was not completed as of 11/26/80.

Company completed an evacuation plan.

In addition, Mr. Chuck informed me that the oil-sand backwash effluent did not meet any of the EP Toxicity criteria.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III, Central Regional Laboratory

DATE: December 8, 1980

SUBJECT: RCRA Inspection for: Amoco Oil, 3901 Asiatic Avenue, Baltimore, Maryland 21226

FROM: Gary W. Smith (3SA21) *GWS*
Engineering Technician

TO: Bruce Smith (3SA30)
Chief, Environmental Emergency Branch

THRU: Howard O. Wilson (3SA21) *HOW*
Acting Chief, Engineering Section

On November 26, 1980 a RCRA inspection was conducted at Amoco Oil Company, Asphalt Refinery, with the participation of Melvin Knot from the Maryland State Department of Health and Mental Hygiene. Amoco Oil Company is working to achieve compliance with the RCRA Regulations for hazardous waste generators. They are in the process of having signs made for their hazardous waste storage area. Amoco Oil has a S.P.C.C. Plan and fire equipment available with an adequate supply of water.

Attached for your information are the completed interim checklists completed during the subject inspection.

GWS/rad

Attachments (2)

Interim Checklist for Inspection of Generators

Name of Facility: INCOG Oil Company

Address: 3901 ACACIA AVE. BALTO: MD 21226

Facility contact and telephone number: Robert Shield - 301-355-2405

Generator's EPA ID Number: MD D003093598

11-26-80

Pertinent Reg
40 C.F.R. Part:

Inspection Procedure

- 262.12 1. Is the generator presently treating, storing, disposing of, transporting, or offering for transport, hazardous waste? YES
- a. If no, explain: _____
2. Generator moves hazardous waste for treatment, storage or disposal on-site or off-site? (If on-site, interim check-list for both a generator and a facility must be completed.) YES
- 262.20 3. Is a manifest system in operation, or has a manifest been developed for off-site shipment of hazardous wastes? YES - Awaiting
4. Check generator's manifest example for the following data:
- a. TSD facility for waste shipment is identified N/A
- b. Manifest document number included YES
- c. Generator's name, mailing address, telephone number, and EPA ID number is included YES
- d. Name and EPA ID number of each transporter is included YES
- e. Name, address, and EPA ID number of any TSD facility described in (a) above, as well as for any alternate facility listed YES
- f. A description of the waste is included YES
- g. The quantity of each waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle is included YES
- h. The following certification appears and is signed by the generator: "This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the available regulations of the DOT and EPA." YES

262.34 5. Check whether hazardous waste is being stored on-site for less than 90 days

N/A

If so:

a. Is the date upon which each period of accumulation began clearly marked on each container?

No Containers

b. Are the containers in good condition, i.e., no leaks or signs of corrosion?

c. Are the containers marked as containing a hazardous waste?

Notable

262.34(a) (5) d. Does the generator have an emergency contingency plan for the wastes being stored?

YES

262.34(a) (5) e. *Does the generator have fire control equipment for the storage site?

YES

262.34(a) (5) f. *Does the generator have an internal communications or alarm system for the storage site, capable of providing immediate emergency instruction to facility personnel?

YES

6. Inspector's comments: Waste only when dredging BACKWASH PIT
20,000 TANK proposed for OIL-SAND (BACKWASH)
which may be considered TOXIC not toxic
run test

* These are not definite requirements; the generator should be asked why such equipment is not in place.

Name of Inspector(s) Gary M. Smith

Date 11-26-80

Date _____

Name of Facility: 21000 Oil Company
Address: 3901 ASIATIC AVE., BALTO. MD 21226
Facility Contact and Telephone Number: Robert Shields (301) 355-2105
Facility's EPA ID Number: MD D003093592

Site Characterization

11-26-80

STORER ✓

TREATER ✓

DISPOSER

Pile _____
Surface Impoundment backwash
Drums ✓ 2000 gal. CAP.
Tank, Above ground _____
Tank, Below ground _____
Other _____

Filtration _____
Incineration _____
Thermal Treatment _____
Volume Reduction _____
Recycling/Recovery _____
Chem/Phys/Bio Treatment _____
Waste Oil _____
Reprocessing STEAM RECYC. FOR BOILER FEED WATER
Solvent Recovery _____
Other _____

Landfill _____
Land Treatment _____
Surface Impoundment _____
Incineration _____
Other _____

Pertinent Reg
40 CFR Part:

Inspection Procedure

265.13(b) 1. Facility has in place a waste analysis plan

YES

265.13(a) a. plan enables facility to identify wastes being brought to the facility

YES

b. plan enables off-site facility to confirm that wastes actually received are what is indicated on manifests

N/A

265.14 2. *Facility has 24 hour surveillance system which monitors and controls entry to the active portion of the site; or has an artificial or natural barrier surrounding the active portion plus a means to control entry at all times

YES

3. *Facility has a sign at each entrance of the active portion with the statement "Danger - Unauthorized Personnel Keep Out"

OK now signs being made

a. sign must be legible from a distance of 25 feet

b. sign must be in English and in any other language predominant in the area

265.15(d) 4. Facility has an inspection log and a written schedule for
265.15(b) inspecting all emergency equipment, security devices, and operating and structural equipment that are important to preventing, detecting, or responding to environmental or human health hazards

YES

265.73 10. Check for presence of a written operating record containing the following data:

265.73(b) (1) a. a description and the quantity of each hazardous waste received and the method and date of treatment, storage, or disposal N/A

265.73(b) (2) b. the location of each hazardous waste within the facility and the quantity at each location Yes

265.73(b) (3) c. records and results of waste analyses and treat tests performed on wastes coming into the facility N/A

265.73(b) (4) d. summary reports and details of all incidents that require implementing the Contingency Plan N/A

265.73(b) (5) e. records and results of inspections performed on facility emergency equipment, TSD systems, and hazardous waste areas Yes

265.112(a) 11. Check for presence of a closure plan at the facility ✓

265.118(a) 12. Check for presence of a post-closure plan at the facility N/A

265.71 13. **Check that facility is following, and is familiar with, the manifest system Available

a. manifest copies are signed and dated ✓

b. a copy is given to the transporter ✓

c. a copy is sent to the generator ✓

d. a copy is retained and filed with the facility ✓

14. Check for other problems at facility including:

a. open fires OK

b. fumes or gasses

c. leaks or corrosion in containers or other storage structures

d. leachate to receiving streams

e. malfunction of equipment

f. heat generation

g. bulging drums

15. Inspector's Comments _____

*This is not always a specific requirement; obtain justification in situations where the facility is not meeting the requirements.

**These requirements do not pertain to on-site facilities unless such facilities also receive hazardous wastes from off-site sources.

INSPECTORS Dary W. Smith

Date 11-26-80

Date _____

265.16 5. Facility has the following documents and records:

265.16(d) (1) a. the job title for each position at the facility related to hazardous waste management and the name of the employee filling each job

just in SPEC training package
CO
JUST STARTED TO RECORD

265.16(d) (2) b. a written job description for each position listed in (a) above

included

265.16(d) (3) c. a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in (a) above

IN CO. PACKAGE

265.32 6. *Facility has the following equipment:

265.32(a) a. an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel

YES

265.32(b) b. a device at the scene of operations capable of summoning emergency assistance from police, fire department, etc.

YES

265.32(c) & (d) c. fire control equipment and an adequate supply of water

YES

265.35 7. *Facility has adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies

YES

265.50 8. Facility must have a contingency plan with the following elements:

265.52(a) a. description of actions facility's personnel will take in response to fires, explosions, or unplanned releases of hazardous waste to air, soil, or water

YES SPEC

265.52(c) b. a description of arrangements agreed to by local police, fire department, hospitals, contractors, and State and local emergency teams to provide assistance during emergency situations

checked w/ fire dept need to do w/ police April
done by planned

265.52(d) c. a list of names, addresses, and phone numbers of the facility emergency coordinator(s)

YES

265.52(e) d. a list of all emergency equipment at the facility where such equipment is required

YES

265.52(f) e. *an evacuation plan for facility personnel

done

Will be added

265.55 9. Facility must have at all times at least one employee either on call or on the site capable of coordinating all emergency response measures (emergency coordinator)

a. name of emergency coordinator(s)

R. Shields

M. Chuck

no production plans by April 1

asphalt plant - no production in winter



R. J. Shields
Manager

Amoco Oil Company
Baltimore Refinery
3901 Asiatic Avenue
Baltimore, Maryland 21226
301-355-2105

*already received
5/21/81*

May 19, 1981

Regional Administrator
EPA Region III
Post Office Box 1480
Philadelphia, PA 19107

Dear Sir:

EPA ID #MDD 003 093 598

In rechecking our RCRA notification and permit application I have noticed that we listed our sour water stripper as a treater, but we inadvertently left off the waste stream (sour water). The stripper was listed because the stream was assumed to be reactive, thus D003 should appear on page 3A of our application. We are currently waiting for test results on this stream, but would still like to include it on our application at this time.

I am attaching a revised page 3A with line numbers 7 and 8 added. Note that we are also adding ignitable (D001) since we may have instances where we must store waste oil.

If you have any questions regarding this requested addition, please contact me.

Yours truly,

R. J. Shields

MJC/sm

Attachment



R. J. Shields
Manager

Amoco Oil Company
Baltimore Refinery
3901 Asiatic Avenue
Baltimore, Maryland 21226
301-355-2105

October 13, 1981

Regional Administrator
EPA Region III
Post Office Box 1480
Philadelphia, PA 19107

Dear Sir:

EPA ID #MDD 003 093 598

Due to a calculating error, please amend page 3A of the subject application. Line number 8 (Hazardous Waste No. D003) should read 20,000 tons instead of 200,000 tons.

Yours truly,

R. J. Shields

MJC/sm

RECEIVED

OCT 14 1981

AIR, Hazardous Waste, D003
MATERIALS DIVISION
EPA REGION III



Amoco Oil Company
Baltimore Refinery
3901 Asiatic Avenue
Baltimore, Maryland 21226
301-355-2105

R. J. Shields
Manager

June 23, 1981

EPA Region III
6th & Walnut St.
Philadelphia, PA 19106

Attention: Mr. William Bud, 3EN24

Dear Sir:

EPA ID #MDD 003 093 598

Attached is a copy of the letter we sent the EPA in May which should answer your question. Please note that T04 operates 24 hours a day for a total of approximately 30,000 gallons per day.

If you have any further questions, please call.

Yours truly,

R. J. Shields

/sm

Attachment

May 19, 1981

Regional Administrator
EPA Region III
Post Office Box 1480
Philadelphia, PA 19107

Dear Sir:

EPA ID #MDD 003 093 598

In rechecking our RCRA notification and permit application I have noticed that we listed our sour water stripper as a treater, but we inadvertently left off the waste stream (sour water). The stripper was listed because the stream was assumed to be reactive, thus D003 should appear on page 3A of our application. We are currently waiting for test results on this stream, but would still like to include it on our application at this time.

I am attaching a revised page 3A with line numbers 7 and 8 added. Note that we are also adding ignitable (D001) since we may have instances where we must store waste oil.

If you have any questions regarding this requested addition, please contact me.

Yours truly,

R. J. Shields

MJC/sm

Attachment

FEDERAL DEPARTMENT OF COMMERCE										FOR OFFICIAL USE ONLY									
M D D 0 0 3 0 9 3 5 9 8										DUP									

IV. DESCRIPTION OF HAZARDOUS WASTES (continue)

A. EPA HAZARDOUS WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)		D. PROCESSES								2. PROCESS DESCRIPTION (if a code is not entered in D(1))																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																						
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R. J. Shields
Manager

Amoco Oil Company

Baltimore Refinery
3901 Asiatic Avenue
Baltimore, Maryland 21226
301-355-2105

March 10, 1981

Mr. B. A. Lacy
Chief, Groundwater Protection Section
United States Environmental Protection Agency
Region III
6th and Walnut Streets
Philadelphia, PA 19106

Dear Mr. Lacy:

EPA ID Number MDD 003 093 598

Please refer to your letter of March 3; we did include underground injection because of our sanitary septic system. Therefore, please change our classification to reflect that we do not inject hazardous wastes underground.

Yours truly,

Robert J. Shields

/sm

HD
FW

4/17



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS

PHILADELPHIA, PENNSYLVANIA 19106

MAR 03 1981

Robert Shields, Manager
Amoco Oil Company
3901 Asiatic Avenue
Baltimore, Maryland 21226

Dear Mr. Shields:

This is to request clarification of the Resource Conservation and Recovery Act (RCRA) Notification Forms sent to the Environmental Protection Agency (EPA).

Underground injection, as you may know, is defined as "the subsurface emplacement of fluids through a bored, drilled, or driven well; or through a dug well where the depth of the dug well is greater than the largest surface dimension." The most common errors made in completing the forms have been in confusing sanitary septic systems and holding tanks with the injection of hazardous wastes. Hazardous wastes are identified in 40 C.F.R. § 261.

If you feel that your business has been improperly categorized, send us a letter requesting a change in classification, giving the reason for the request. On the other hand, if you feel that your business does in fact inject hazardous wastes underground, please inform us of what is injected for our verification process. You should send your reply within ten (10) days of receipt of this letter, so that we can update our inventory. We request that you include your EPA ID Number (MDD 003 093 598) in your response.

Thank you for your cooperation, we look forward to hearing from you in the next few weeks. If you have any questions, please contact me at (215) 597-9016 or (215) 597-9000.

Sincerely yours,

Benjamin A. Lacy
Benjamin A. Lacy
Chief, Groundwater Protection Section

cc: Robert Allen (3AH30)
Shirley Bulkin (3EN24)



J. F. Horner
Vice President - Refining & Engineering

Amoco Oil Company

200 East Randolph Drive
Post Office Box 6110-A
Chicago, Illinois 60680
Refining & Engineering Department
312-856-5450

November 18, 1980

Certified Mail, Return Receipt
Certification No. P26 2048571

Regional Administrator
EPA Region III
Post Office Box 1480
Philadelphia, Pennsylvania 19107

Dear Sir:

Attached, please find the Part A application for the permit for hazardous waste management facilities associated with operation of the Amoco Oil Company refinery at Baltimore, Maryland. Submission of the attached application was delayed until today in order to afford the opportunity to obtain the maximum EPA clarification of specific requirements of the applicable regulations.

The regulations issued pursuant to RCRA, namely 40 CFR Parts 122 through 124 and Parts 260 through 265, are complex and subject to different interpretations. These interpretations may change as the U.S. EPA attempts to clarify specific requirements by issuing Regulatory Interpretive Memoranda or through amendment by rule. We were hopeful that these clarifications would be issued by EPA early enough prior to November 19 to allow for incorporation in our application, if necessary. However, this did not occur. The attached interim status permit application, Part A, constitutes a good faith effort by the Standard Oil Company (Indiana) and its Amoco Oil Company subsidiary to comply with these regulations and requirements as we understand them.

However, we reserve the right to supplement, amend, or otherwise modify, the attached interim status application should our original interpretation be found inconsistent with U.S. EPA's interpretation, or subsequent clarifications and amendments by the Agency lead to different interpretations than incorporated in our application.

Yours truly,

JFH/11h

Attachment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

EPA I.D. # MDD003093598

December 12, 1980

Amoco Oil Co.
Mr. Robert Shields
3901 Asiatic Ave.
Baltimore, Md. 21226

Re: Acknowledgment of Application for
a Hazardous Waste Permit

This is to acknowledge that the Environmental Protection Agency has received: (1) A notification pursuant to Section 3010 of the Resource Conservation and Recovery Act for the facility located at the address shown above; and (2) Part A of a Hazardous Waste Permit Application for that facility, including a signed statement that the operation of the facility, or its construction, began prior to November 19, 1980. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 CFR Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.